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October 1, 2012

EX PARTE NOTICE

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

GN Docket Nos. 09-47, 09-51, 09-137, and RM-11358

Dear Ms. Dortch:

In follow-up to the meeting COMPTEL had with representative from the Wireline Competition Bureau and Office of Strategic Planning and Policy Analysis, COMPTEL is providing examples of member companies¹ that use Ethernet over Copper (EoC) to provide broadband services to various entities including banks, major pipeline companies, schools, car dealerships, realtors, healthcare facilities, restaurants, and news organizations. These offerings demonstrate the ability to provide innovative and affordable broadband services, and thereby achieve the Commission's broadband goals, when competitors have access to copper facilities.

As we stated previously, technological advancements have made copper the most ubiquitous existing broadband infrastructure. The attached article discusses some of these technologies and the critical cost savings EoC provides small-medium businesses. As the article explains, "EoC burst onto the scene at the right time for small-medium businesses that cannot afford to purchase budget-busting fiber connections but need something more than a T-1 – or even a VDSL line – to feed their increasing data appetite."² Copper retirement "is a shame, in a way, because in this economy where businesses are looking to expand without paying the price to do so, it seems that Ethernet-over-copper is... 'a capability that's out there to continue to

¹ This includes TC3 which is a member of the Michigan Internet and Telecommunications Alliance, a COMPTEL member.

² "Finding New Gold in Copper, *FierceTelecom*, pp. 5, September 2012. Available at: servicecenter.fiercemarkets.com/files/leadgen/final_copper_networks.pdf

provide quality services at a lower cost for businesses, allowing them to reduce their telecom expense and hopefully grow their businesses accordingly.”³

Please do not hesitate to contact me if you have any questions regarding this submission.

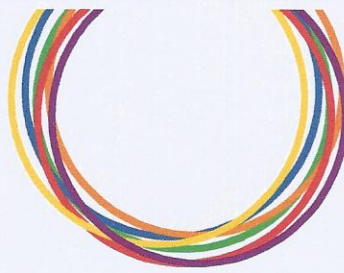
Respectfully submitted,

/s/ Karen Reidy

Attachment

cc (via email): Lisa Gelb
Bill Dever
Tim Stelzig
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Jenny Prime
Claude Aiken
Ariane Rangel
Pamela Megna
Wesley Platt
Heather Hendrickson
Henning Schulzrinne

³ *Id.* at 6.

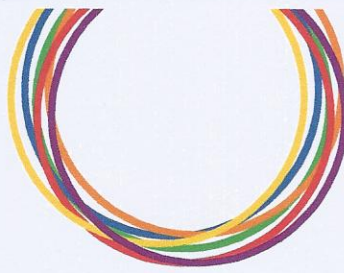


Alpheus Communications, LLC and its wholly owned subsidiary, Alpheus Data Services, L.L.C. (collectively Alpheus) provides, among its other services, Ethernet broadband services that we create by installing the appropriate electronics on copper loop facilities that we acquire from the incumbent local exchange carrier. The Table below summarizes the representative speeds that Alpheus is able to offer its customers at the distances noted.

Technology Used (ex. ADSL2+, VDSL, G.SHDSL, Bonded Pairs etc.)	Equipment Manufacturer	Model	Aggregate Speed (including distance limitations – ex. 5.7Mb/s @ 3000ft. or less)
G.SHDSL	Overture f/k/a Hatteras	Hn4000 and Hn6100	Up to 45 meg @5k Up to 10 meg at 12K Generally 1/3 of orders can be processed up to 45 meg with another 1/3 of orders at 10 meg.
Bonded Pairs	Overture f/k/a Hatteras	Hn4000 and Hn6100	Up to 45 meg @5k Up to 10 meg at 12K Generally 1/3 of orders can be processed up to 45 meg with another 1/3 of orders at 10 meg.

We provide this service to both wholesale carriers and retail customers that range from CLECs, ISPs, to the banking industry, companies responsible for the electric grid in Texas, law firms, major pipeline companies, healthcare groups and medical facilities, schools, car dealerships, realtors, restaurants to name a few. Our wholesale delivery empowers internet service providers with a full delivery platform and CLECs the ability to add to their portfolio of products and services. Alpheus also offers direct internet access, metro ethernet and E-LAN over this broadband platform to both retail and wholesale channels. Our full array of products and services as well as our network reach can be reviewed at www.alpheus.net.

Providing broadband over copper using ethernet technology directly helps small to medium businesses. One of our customers was able to cost effectively enter the Texas marketplace with the help of Alpheus. HKA Enterprises, Inc. is organized to deliver exceptionally talented professionals with experience in engineering services, construction services, operations and maintenance, transmission and distribution and information technology. They provide these resources via contract and direct placement services. HKA is dedicated to resolving staffing challenges clients face. Additionally HKA is focused on evolving with market conditions to help clients maintain the competitive edge in the markets served.



Alpheus Communications, LLC
Alpheus Data Services, L.L.C.
1301 Fannin Street
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713-336-6565

Headquartered in Duncan, South Carolina the leadership found it critical to get in the Texas market. This required finding the right location for their new branch in Texas. Recently HKA targeted Houston, Texas as a location to enter to form long-term strategic partnerships for their business. They needed to be in area of the city away from the costs associated with Class A real estate where generally fiber has been deployed. They needed an area of town that provided them the ideal business location for competitive services and rents but that also had access to high quality broadband which is mission critical for their operation. Alpheus Communications was able to work with HKA to find that ideal location by proving broadband internet access using an ethernet over copper solution. The EOC solution afforded a broad base of real estate locations from which to choose and quickly allowed HKA to confidentially select a location that would meet the total operational and budgetary needs of the company including access to high speed broadband.

This is just one of many examples of how EOC empowers small to medium businesses with choices for high speed broadband other than fiber which is not normally deployed to small business locations such as strip shopping centers and stand alone small business locations.

Patricia M. Hogue
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Nasdaq: HTCO

Enventis Telecom, Inc. provides Ethernet broadband services to customers in Minnesota and Iowa. These services are created using copper loop facilities that we acquire from CenturyLink. Below is a table summarizing the representative speeds Enventis is able to offer its customers.

Technology Used (ex. ADSL2+, VDSL, G.SHDSL, Bonded Pairs etc.)	Equipment Manufacturer	Model	Aggregate Speed (including distance limitations – ex. 5.7Mb/s @ 3000ft. or less)
G.SHDSL	Adtran	Total Access 5000	5.7Mb/s @ 3kft or less.
HDSL4	Adtran	Total Access 3000	1.5Mb/s @16kft

Enventis Telecom, Inc. provides these services to retail customers, which range from rural health care providers, school districts, banks, news organizations and manufacturers. These services are also provided on a wholesale basis to other carriers, enabling them to further utilize the incumbents' loops to develop their portfolio of services. Our full array of products and services and more information on the company can be reviewed at [www. Enventis.com](http://www.Enventis.com)



William D. VanderSluis
Director, Regulatory Affairs
September 17, 2012



September 19, 2012

TC3 provides, among its other services, Ethernet broadband service that we create by installing the appropriate electronics on copper loop facilities that we acquire from the incumbent local exchange carrier. The Table below summarizes the representative speeds that TC3 is able to offer its customers at the distances noted.

Technology Used (ex. ADSL2+, VDSL, G.SHDSL, Bonded Pairs etc.)	Equipment Manufacturer	Model	Aggregate Speed (including distance limitations – ex. 5.7Mb/s @ 3000ft. or less)
ADSL2+-bonded	Occam Networks	6252	48 mb/s @ 10000ft. or less
G.SHDSL Bonded	Zhone	ETH-3484	45 Mb/s @ 10000ft or less

We provide this service to Businesses and the above Internet Access Data based products over this broadband platform.

A handwritten signature in black ink, appearing to read "Joseph P. Mattausch", written over a horizontal line.

Joseph P Mattausch
President
247 S Main St
Adrian, MI 49221
517-266-0402



U.S. TelePacific Corp and Mpower Communications, both d/b/a TelePacific Communications, provide among its services, Ethernet broadband service that we create by installing the appropriate electronics on copper loop facilities which we acquire from the incumbent local exchange carrier. The Table below summarizes the representative speeds that TelePacific is able to offer its customers at the distances noted.

Technology Used (ex. ADSL2+, VDSL, G.SHDSL, Bonded Pairs etc.)	Equipment Manufacturer	Model	Aggregate Speed (including distance limitations – ex. 5.7Mb/s @ 3000ft. or less)
E.sHDSL	Adtran	Ta5k	Up to 10 Mb/s @ 10k ft

We provide service to thousands of small and mid-sized business customers as well as to e-Rate-qualified schools and libraries and rural health care providers in California, Nevada and Texas. In some cases, Ethernet over Copper HDSL replaced dial up internet connectivity.

Nancy E. Lubamersky
VP, Public Policy and Strategic
Initiatives
515 S. Flower Avenue, 47th floor
Los Angeles, CA 90071



TeleQuality Communications, Inc. provides, among its other services, Ethernet broadband service that we create by installing the appropriate electronics on copper loop facilities that we acquire from the incumbent local exchange carrier. The Table below summarizes the representative speeds that TeleQuality Communications, Inc. is able to offer its customers at the distances noted.

Technology Used (ex. ADSL2+, VDSL, G.SHDSL, Bonded Pairs etc.)	Equipment Manufacturer	Model	Aggregate Speed (including distance limitations – ex. 10mb/s @ 18000ft. or less)
Bonded Pairs	Overture	400/600	10+MB

We provide this service to rural healthcare facilities throughout the United States and Ethernet is delivered over this broadband platform.

Tim Koxlien
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